

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In re: Vicky Rodríguez-Torres
Debtor

Vicky Rodríguez-Torres
Plaintiff

v.

Enid López-López
Guillermo Camba-Casas
Mariela Rexach-Rexach
Government Development Bank PR, et al.
Defendants

09-10864-BKT7
Chapter 7

ADVERSARY PROCEEDING
10-00137-BKT

18 U.S.C. § 1030,
18 U.S.C. § 2510,
18 U.S.C. § 2701,
42 U.S.C. § 1983,
42 U.S.C. § 1985,
42 U.S.C. § 1988,
TORTS

LEAVE TO FILE DEFAULT JUDGMENT

TO THE HONORABLE COURT:

Now comes Debtor, through the undersigned attorney, and respectfully alleges and prays as follows:

1. The instant adversary proceeding was filed, and summons were issued, on August 9th, 2010. See: ECF No. 1 - 2.
2. Co-defendant Enid Lopez was served a summons and a copy of the complaint via US Postal Service on August 11th, 2010, as follows:



3. See: Exhibit 1, USPS Delivery Confirmation Report.

4. Co-defendant Guillermo Camba was served a summons and a copy of the complaint via US Postal Service on August 12th, 2010, as follows:



5. See: Exhibit 2, USPS Delivery Confirmation Report.

6. At least forty-six (46) days have elapsed since both co-defendants were served a summons and a copy of the complaint.

7. Neither co-defendant Enid Lopez, nor co-defendant Guillermo Camba have appeared before the Court or served an answer to the complaint.

WHEREFORE, for all of the above, Debtor prays that this Honorable Court:

GRANT Debtor leave to file a Motion for Default Judgment against co-defendant Enid Lopez and co-defendant Guillermo Camba.

Submitted in New York, New York, this 27th day of September, 2010.

S/William E. Meléndez Menéndez

William E. Meléndez Menéndez

USDC PR No. 226902

Attorney for Debtor
410 Park Avenue 15th Floor, Suite # 1223
New York, New York 10022

Tel. (718) 725-7387

We.Melendez@e-Lex.us

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties in interest.

In New York, New York, this 27th day of September, 2010.

S/William E. Meléndez Menéndez

William E. Meléndez Menéndez

USDC PR No. 226902